

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA, NORTHERN DIVISION

DECATUR ATHLETIC CLUB, LLC )  
 )  
EIN NO.: XX-XXX2840 ) CASE NO. 17-81439-CRJ-11  
 ) CHAPTER 11  
Debtor )

**FINAL APPLICATION OF MAPLES LAW FIRM, PC,  
FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES**

**PART I. COVER SHEET**

1. Name of Applicant: Maples Law Firm, PC
2. Date Application for Employment was filed: 5/25/17
3. Date of Order Authorizing Employment: 6/20/17
4. Professional Services Provided to: Debtor
5. Period for which Compensation is Sought: 4/1/18 – 8/31/18
6. Amount of Fees Sought: \$17,276.25
7. Amount of Expenses Sought: \$27.20
8. This is an \_\_\_\_\_ Interim Application  Final Application
9. If this is not the first application filed in this case by this professional, disclose as to all prior applications: First Fee Application approved 2/27/18; Second Fee Application approved 7/24/18
10. The aggregate amount of compensation and expenses allowed to date per Court's Order dated 7/25/17 [Doc. 43] and fee applications: \$61,146.91
11. The 20% allowance to be approved on this application: \$3,455.25
12. The aggregate amount of compensation and expenses paid to date: \$3,656.92

/s/STUART M. MAPLES  
STUART M. MAPLES

MAPLES LAW FIRM, PC  
200 CLINTON AVE. WEST, SUITE 1000  
HUNTSVILLE, AL 35801  
(256) 489-9779 – TELEPHONE  
[smaples@mapleslawfirmpc.com](mailto:smaples@mapleslawfirmpc.com)

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA, NORTHERN DIVISION

DECATUR ATHLETIC CLUB, LLC )  
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EIN NO.: XX-XXX2840 ) CASE NO. 17-81439-CRJ-11  
 ) CHAPTER 11  
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**PART II – VERIFICATION OF APPLICATION  
FOR COMPENSATION AND EXPENSES**

The undersigned, having been duly sworn, certifies that Stuart M. Maples is the person signing and certify matters contained within the interim Application for Compensation and Reimbursement for Expenses filed with this Court. All matters set forth in the Application for Compensation are true and correct to the best of his knowledge and belief.

/s/ Stuart M. Maples  
STUART M. MAPLES  
Affiant

SWORN TO AND SUBSCRIBED before me on September 25, 2018.

/s/Kristin Pickett  
Notary Public  
My Commission Expires: 5/19/21

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA, NORTHERN DIVISION

DECATUR ATHLETIC CLUB, LLC )  
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EIN NO.: XX-XXX2840 ) CASE NO. 17-81439-CRJ-11  
 ) CHAPTER 11  
Debtor )

**PART III. INTERIM APPLICATION FOR  
COMPENSATION AND REIMBURSEMENT OF EXPENSES**

COMES NOW, the Maples Law Firm, P.C. and its Attorneys (hereinafter "Applicant"), as counsel for Decatur Athletic Club, LLC, Debtor in Possession ("Debtor") and says:

I. INTRODUCTION

1. That Applicant makes this interim application for compensation and reimbursement of actual and necessary costs and expenses incurred by it in the course of its representation of the Debtor through.
2. The Chapter 11 bankruptcy petition for Debtor was filed with this Court on May 10, 2017.
3. This Court entered an order approving the employment of Stuart M. Maples and the firm of Maples Law Firm, P.C. as counsel for Debtor on June 20, 2017.
4. All services for which compensation is requested by this Applicant were performed for and on behalf of the Debtor and not on behalf of any other person.
5. The results achieved to date have required a substantial expenditure of time, energy and expertise. The Debtor has required active legal representation of the highest caliber on an on-going basis in order to serve its needs in the Chapter 11 proceeding.
6. Applicant makes this application under 11 U.S.C. § 330 and 331 of the Bankruptcy Code and seeks allowance of reasonable compensation for the professional services which it has rendered and for reimbursement of the actual necessary expenses which it has incurred in connection herewith.

7. Applicant has rendered services on behalf of Debtor as shown in Exhibit "A". Applicant, therefore, seeks an allowance of interim compensation in the amount of \$17,276.25 for professional services rendered as counsel for the Debtor and the reimbursement of actual expenses incurred in the amount of \$27.20 for representation from April 1, 2018 through August 31, 2018.
8. Professional services required in this matter and described in this application were performed by an attorney who possesses experience and skills in the area in which he rendered services. Attorney fees awarded pursuant to this application shall not be shared or divided except as allowed by law.
9. Applicant represents that the allowance for interim compensation and reimbursement of expenses required herein is reasonable and fully complies with § 331 of the Bankruptcy Code.

WHEREFORE, PREMISES CONSIDERED, Applicant respectfully requests that it be allowed the sum of \$17,276.25 as interim compensation for professional services rendered as attorney for the Debtor and for reimbursement of actual and necessary expenses incurred in the amount of \$27.20 from April 1, 2018 through August 31, 2018, and that it be granted such further and additional relief as this Court may deem just and proper.

Dated September 25, 2018.

/s/ Stuart M. Maples

Stuart M. Maples  
Counsel for Debtor

Maples Law Firm, P.C.  
200 Clinton Ave. West, Suite 1000  
Huntsville, AL 35801  
(256) 489-9779  
[smaples@mapleslawfirmpc.com](mailto:smaples@mapleslawfirmpc.com)

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a true and correct copy of the foregoing document upon the following either by U.S. Mailing, proper addressed, or electronic mail on September 25, 2018.

Richard Blythe  
Bankruptcy Administrator  
P. O. Box 3045  
Decatur, AL 35602

Decatur Athletic Club  
219 2<sup>nd</sup> Ave.  
Decatur, AL 35603

All parties requesting notice through the Court's ECF system

20 Largest Creditors

/s/ Stuart M. Maples  
Stuart M. Maples

**Maples Law Firm, PC**  
 200 Clinton Avenue West, Suite 1000  
 Huntsville, Alabama 35801  
 256.489.9779  
 Tax ID No. 26-2476092  
**STATEMENT FOR SERVICES RENDERED**

Jeremy Goforth  
 2924 Legacy Drive  
 Decatur AL 35603

Page: 1  
 05/04/2018  
 Account No: 842-000M  
 Statement No: 111180

Chapter 11 Bankruptcy

Fees

			Rate	Hours	
03/29/2018	SMM	Worked on Decatur Mall issue	360.00	0.75	270.00
04/02/2018	KP	Meet w/ SMM re status of settlement w/ Decatur Mall; objections to Plan and affirmative votes	125.00	0.25	31.25
	SMM	Worked on Plan and mall settlement	360.00	1.75	630.00
04/03/2018	SMM	Worked on Plan	360.00	1.50	540.00
04/06/2018	KP	Identify, gather and organize pleadings and documents pertinent to 4/9 hearing on Motion to Convert	125.00	0.25	31.25
04/09/2018	SMM	Attend motion to dismiss	360.00	1.50	540.00
04/10/2018	DM	Preparation and mailing of monthly fee notice.	130.00	0.50	65.00
04/11/2018	KP	Meet w/ DSS re Amended Plan and Disclosure filing deadlines	125.00	0.25	31.25
04/12/2018	KP	Meet w/ SMM; work on 4th Amended Plan and Amended Disclosure Statement; Amended Ballot	125.00	0.50	62.50
	DSS	Review and respond to email from KP; review email from opposing counsel; meet with SMM	225.00	0.50	112.50
04/16/2018	KP	Con't working on amended Plan, Disclosure Statement and Ballot	125.00	3.00	375.00
04/17/2018	KP	Edit Plan, Disclosure Statement and Ballot	125.00	0.75	93.75
	SMM	Worked on Plan	360.00	4.00	1,440.00
04/18/2018	SMM	Worked on Plan	360.00	2.00	720.00
04/19/2018	KP	Revised and finalize Amended Disclosure Statement, Amended Plan and supporting exhibits; efile same	125.00	1.00	125.00
	SMM	Worked on Plan	360.00	1.00	360.00
04/20/2018	KP	Mail out of Plan, Disclosure Statement, Order and Ballot to all creditors	125.00	1.00	125.00
04/23/2018	KP	Draft Notice of Service of Plan, Disclosure Statement, Order and Ballot to all creditors; finalize and efile same	125.00	0.25	31.25

Jeremy Goforth

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05/04/2018

Account No: 842-000M

Statement No: 111180

Chapter 11 Bankruptcy

	Rate	Hours	
For Current Services Rendered		20.75	5,583.75

Expenses

04/20/2018	Postage - Mail out of Amended Disclosure Statement, Amended Plan, Amended Ballot and Order to all Creditors	27.20
	Total Expenses	<u>27.20</u>
	Total Current Work	5,610.95

**Maples Law Firm, PC**  
 200 Clinton Avenue West, Suite 1000  
 Huntsville, Alabama 35801  
 256.489.9779  
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Jeremy Goforth  
 2924 Legacy Drive  
 Decatur AL 35603

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 06/06/2018  
 Account No: 842-000M  
 Statement No: 111270

Chapter 11 Bankruptcy

Fees

			Rate	Hours	Fees
05/02/2018	KP	Review corr from SMM and creditors re affirmative Plan votes	125.00	0.25	31.25
	SMM	Worked on Plan and solicitation	360.00	2.50	900.00
05/04/2018	KP	Meet w/ SMM re IRS objection to Plan confirmation; email to clt re copy of same	125.00	0.25	31.25
	SMM	Worked on confirmation issues	360.00	1.25	450.00
05/07/2018	KP	Work on drafting proposed Ch. 11 Confirmation Order; review secured creditors' suggested Plan language modifications	125.00	1.25	156.25
05/08/2018	SMM	Worked on confirmation	360.00	1.25	450.00
	DM	Preparation of monthly fee notice and send out same.	130.00	0.50	65.00
05/09/2018	KP	Draft Memo in Support of Confirmation	125.00	1.00	125.00
	SMM	Worked on confirmation	360.00	0.75	270.00
05/10/2018	SMM	Worked on memorandum	360.00	0.75	270.00
05/11/2018	KP	Receive and review United Leasing and Life Fitness Plan ballots; draft Summary of Ballots	125.00	0.50	62.50
05/14/2018	KP	Meet w/ SMM re status of plan votes	125.00	0.25	31.25
	SMM	Worked on confirmation and voting	360.00	1.25	450.00
05/15/2018	KP	Receive and review plan ballot from Direct Capital and Decatur Mall; update Ballot Summary; draft Response to Motion for Relief filed by United Leasing; finalize Motion and efile same; meet w/ SMM re affirmative Plan votes; email to K. Heard re Twickenham ballot	125.00	2.75	343.75
05/16/2018	KP	Email exchange w/ K. Heard	125.00	0.25	31.25
05/17/2018	KP	Final editing to Memo in Support of Confirmation	125.00	0.75	93.75
	SMM	Worked on memorandum and ballot summary	360.00	2.50	900.00
	DSS	Email to and from KP regarding ballot summary	225.00	0.25	56.25
05/18/2018	KP	Finalize Memo in Support of Confirmation and Ballot Summary; efile same	125.00	0.25	31.25

Jeremy Goforth

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06/06/2018

Account No: 842-000M

Statement No: 11127C

## Chapter 11 Bankruptcy

			Rate	Hours	
05/22/2018	KP	Receive and review email from R. Blythe re delinquent TR; email exchange w/ clt re same	125.00	0.25	31.25
	SMM	Worked on confirmation	360.00	1.25	450.00
05/24/2018	KP	Identify, gather and organize documents pertinent to confirmation hearing	125.00	0.50	62.50
	SMM	Attend confirmation hearing	360.00	2.50	900.00
05/25/2018	KP	Draft proposed Order Approving Oral Pre-Modification of Plan; draft proposed Chapter 11 Confirmation Order	125.00	1.25	156.25
05/29/2018	KP	Draft proposed Order Approving Third Amended Disclosure Statement as Supplemented; con't drafting Chapter 11 Confirmation Order	125.00	1.25	156.25
05/30/2018	KP	Receive and review email from M. Evans and discuss same with SMM	125.00	0.25	31.25
05/31/2018	SMM	Worked on confirmation For Current Services Rendered	360.00	1.25	450.00
		Total Current Work			6,986.25

**Maples Law Firm, PC**  
 200 Clinton Avenue West, Suite 1000  
 Huntsville, Alabama 35801  
 256.489.9779  
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**STATEMENT FOR SERVICES RENDERED**

Jeremy Goforth  
 2924 Legacy Drive  
 Decatur AL 35603

Page: 1  
 07/07/2017  
 Account No: 842-000M  
 Statement No: 110103

Chapter 11 Bankruptcy

Fees

			Rate	Hours	
06/06/2017	DM	Scan and email BA's forms to client.	130.00	0.25	32.50
	DM	T/c with client regarding documents needed for meeting with BA	130.00	0.25	32.50
06/07/2017	KP	t/c to R. Blythe re 6/8/17 mtg with BA; rescheduled to 6/20/17	110.00	0.25	27.50
06/08/2017	KP	t/c to clt re rescheduled BA mtg w/ R. Blythe	110.00	0.25	27.50
	DM	T/c with client regarding rescheduling of BA meeting and continuance of 341.	130.00	0.25	32.50
06/09/2017	DM	T/c with client regarding Les Mills; draft letter to Les Mills	130.00	0.50	65.00
06/15/2017	SMM	Worked on Pawnee demand	360.00	0.50	180.00
06/16/2017	SMM	Prepare for 341 meeting; worked on Premium Finance issue with BB&T	360.00	0.50	180.00
	DSS	Meet with SMM regarding hearing prep	225.00	0.25	56.25
	KM	Identify, gather, and organize materials pertinent to 6/19/17 hearing and prepare DSS folder for same	55.00	0.25	13.75
06/19/2017	KP	Identify, gather and organize documents pertinent to 6/20 meeting with BK Administrator and 341 Meeting of Creditors; prepare hearing folder for same; draft Order Setting Bar Date and Order Granting Application to Employ MLF	110.00	1.00	110.00
	SMM	Worked on issues regarding payment to BB&T	360.00	0.25	90.00
	DSS	Attend Status Conference and Application to Employ hearing; work on Order on Application to Employ and Motion to set bar date; emails to and from KP and KM; meet with SMM	225.00	2.00	450.00
06/20/2017	SMM	Attend 341 meeting and BA meeting	360.00	2.50	900.00
	SMM	Review claims notice	360.00	0.25	90.00
	DSS	Review and respond to emails from KM and KP regarding Notice of Bar Date	225.00	0.50	112.50
	KM	Make final revisions to Notice of Bar Date for Filing Claims; e-file with BK Court; prepare and mail same to all creditors listed on the mailing matrix and all other parties requesting notice; email proposed Order Approving Application to Employ SMM as Attorney to Court	55.00	1.25	68.75
06/23/2017	KP	Draft Motion to Approve Pay Procedures	110.00	0.50	55.00
	SMM	Review email and bank statements regarding Impulse and Hartselle	360.00	0.50	180.00
	SMM	Worked on procedures motion	360.00	0.50	180.00
	SMM	Worked on Impulse and Hartselle transfer issues	360.00	0.75	270.00

## Chapter 11 Bankruptcy

			Rate	Hours	
06/26/2017	KP	Finalize Motion to Approve Pay Procedures and efile same	110.00	0.25	27.50
06/29/2017	KP	Access Ramsey County, ND district court records database to assess service of summons and complaint by Western Equipment; review and analyze complaint; draft Motion to Extend Automatic Stay	110.00	1.25	137.50
	SMM	Telephone call to client regarding payments	360.00	0.50	180.00
	DSS	Meet with SMM and KP	225.00	0.50	112.50
06/30/2017	KP	Con't drafting Motion to Extend Automatic Stay	110.00	0.50	55.00
		For Current Services Rendered			
				16.25	3,666.25

Expenses

06/20/2017	Postage for mail out of Notice of Bar Date for Filing Claims to all creditors listed on the mailing matrix and all other parties requesting notice	10.12
	Total Expenses	10.12
	Total Current Work	3,676.37
	<b>TOTAL AMOUNT DUE</b>	<b><u>\$3,676.37</u></b>

## PAYMENT DUE UPON RECEIPT

**Maples Law Firm, PC**  
200 Clinton Avenue West, Suite 1000  
Huntsville, Alabama 35801  
256.489.9779  
Tax ID No. 26-2476092  
**STATEMENT FOR SERVICES RENDERED**

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08/06/2018

Account No: 842-000M

Statement No: 111439

Jeremy Goforth  
2205 Century Court SE  
Decatur AL 35601

Chapter 11 Bankruptcy

Fees

			Rate	Hours	
07/23/2018	KP	Analyzed, identified, and organized documents and pleadings pertinent to 7/23 hearing	125.00	0.25	31.25
	SMM	Attend hearing on second fee application	360.00	0.75	270.00
07/24/2018	KP	Draft proposed Order Granting Second Application for Compensation; draft email to Judge regarding review and entry of same For Current Services Rendered	125.00	0.50 1.50	62.50 363.75
		Total Current Work			363.75

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Jeremy Goforth  
 2205 Century Court SE  
 Decatur AL 35601

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 09/14/2018  
 Account No: 842-000M  
 Statement No: 111663

Chapter 11 Bankruptcy

Fees

			Rate	Hours	
08/01/2018	KP	Receive and analyze email from Richard O'Neal re additional IRS language for insertion into Ch. 11 Confirmation Order	125.00	0.25	31.25
	KP	Revise Confirmation Order to include additional IRS language; proof and email order to M. Evans, K. Heard, R. O'Neal, H. Trousdale for review and consent	125.00	0.25	31.25
	SMM	Worked on Confirmation Order	360.00	0.25	90.00
08/02/2018	KP	Review correspondence received from H. Trousdale re revisions to proposed Ch. 11 Confirmation Order; confer with SMM re same; review and analyze previous treatment provided for Decatur Mall in Ch. 11 Plan	125.00	0.25	31.25
	KP	Revise proposed Ch. 11 Confirmation Order to include \$74 lump sum payment to Decatur Mall; draft email to H. Trousdale re review and consent	125.00	0.25	31.25
	SMM	Worked on Decatur mall language in confirmation order	360.00	0.50	180.00
08/06/2018	KP	Email exchange w/ H. Trousdale re additional edits to Decatur Mall's treatment in Ch. 11 Confirmation Order, edit Order per H. Trousdale's suggested revisions	125.00	0.25	31.25
08/08/2018	KP	Email exchange w/ K. Heard and H. Trousdale to f/u on status of consent of proposed confirmation order	125.00	0.25	31.25
	KP	Draft email to Judge re consideration and entry of proposed Confirmation Order, Order Approving Oral Pre-Confirmation Modification to Plan, and Order Approving Third Amended Disclosure Statement	125.00	0.25	31.25
08/10/2018	KP	Draft email clt re copy of Ch. 11 Confirmation Order and Debtor's payment obligations to Decatur mall; email exchange w/ H. Trousdale re Debtor's payment instructions	125.00	0.25	31.25
08/14/2018	KP	Draft post-confirmation payment instructions letter; draft email to SMM re same	125.00	1.25	156.25
		For Current Services Rendered		4.00	676.25
		Total Current Work			676.25